



**Doehler-Jarvis**

EPA Region 5 Records Ctr.



340026

R

SEP 08 1993

**SUPERFUND PROGRAM  
MANAGEMENT BRANCH**

September 1, 1993

Ms. Marsha A. Adams  
5HSM-5J  
Responsible Party Search Section  
U.S.E.P.A.  
77 W. Jackson Blvd.  
Chicago, Il 60604-3590

Dear Ms. Adams:

On August 19, 1993, Doehler-Jarvis Limited Partnership received a Request for information from USEPA regarding the Stickney Avenue Landfill Site and the Tyler Street Dump Site, Toledo, Ohio. The information request indicates that the disposal activity occurred during the 1951 to 1981 time period.

Doehler-Jarvis Limited Partnership was not organized until July 9, 1990. As such, the alleged disposal activity at the Stickney Avenue Landfill Site and the Tyler Street Dump Site took place prior to our existence. Doehler-Jarvis Limited Partnership currently owns the manufacturing facility in Toledo located at 5400 N. Detroit Avenue (the "Plant"). Prior to the organization of Doehler-Jarvis, the Plant was owned by Farley Inc. and NL Industries. We have put Farley Inc. and NL Industries on notice in this regard.

The time period of the inquiry is significantly earlier than Doehler-Jarvis Limited Partnerships' organization, however, in order to comply with the legal requirements of the Information Request, Doehler-Jarvis Limited Partnership is responding to the inquiries listed in that document.

Doehler-Jarvis Limited Partnership objects to providing the home addresses of the persons identified in this Response. Doehler-Jarvis Limited Partnership also objects to responding on the basis of knowledge, information or documents in the possession, custody or control of Doehler-Jarvis Limited Partnerships' former employees, agents, servants, contractors or attorneys, especially since the relevant period covers approximately 30 years. These requirements are overbroad and impose a legally impermissible burden upon Doehler-Jarvis Limited Partnership.

Doehler Jarvis Limited Partnership further objects to the Information Requests to the extent that they seek documents or information which is subject to the attorney-client privilege or the work product

5400 North Detroit Avenue, Toledo, Ohio 43612-3514  
Mailing Address: M.P.O. Box 902, Toledo, Ohio 43697-0902  
Tel. (419) 470-8020 FAX (419) 470-8185

doctrine. Accordingly, Doehler-Jarvis Limited Partnership makes the following responses based on non-privileged information currently available through present employees.

Question 1. The following persons were consulted in preparation of this request:

Marty McCullum, Plant Controller  
Doehler-Jarvis Limited Partnership  
5400 N. Detroit Ave.  
Toledo, Ohio 43612

Alvin Boerst, Purchasing Agent  
Doehler-Jarvis Limited Partnership  
5400 N. Detroit Ave.  
Toledo, Ohio 43612

David Adkins, Purchasing Manager  
Doehler-Jarvis Limited Partnership  
5400 N. Detroit Ave.  
Toledo, Ohio 43612

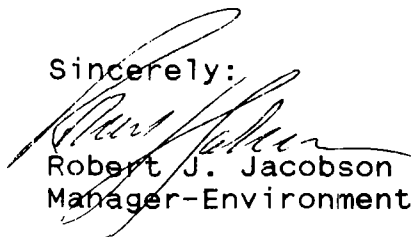
2. Since Doehler-Jarvis Limited Partnership originated in July of 1990 and the Request for Information period is 1951 to 1981, there are no Doehler-Jarvis Limited Partnership documents which would provide information relative to this action. Doehler-Jarvis Limited Partnership does not have purchasing and accounting documents maintained by the previous owners of the Plant for the time period involved.
3. Doehler-Jarvis Limited Partnership does not have any reason to believe that any other person might be able to provide more detailed or complete response to any information contained in this request, but is willing to provide the following information. Previous owners of the Plant, NL Industries, 445 Park Ave, New York, NY 10022, and Farley Inc., 6300 Sears Tower, 233 S. Wacker Dr., Chicago, IL. 60604 may have information relative to the site.
4. OHD005045992.
5. Doehler-Jarvis Limited Partnership does not currently know of any acts or omissions of any person, including Doehler-Jarvis Limited Partnership employees, contractors or agents that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants at the Site, or damages resulting therefrom.
6. Since Doehler-Jarvis Limited Partnership did not send any waste material, hazardous or otherwise, to the site, no one has information or knowledge about the generation, transportation, treatment, disposal or other handling of

materials sent to this site from Doehler-Jarvis Limited Partnership. The previous owners of the Plant, Farley Inc., 6300 Sears Tower, 233 S. Wacker Dr. Chicago, IL 60604 or NL Industries, 445 Park Ave., New York, NY 10022, may have knowledge regarding disposal activities at the site prior to Doehler-Jarvis Limited Partnership's origination.

7. Doehler-Jarvis Limited Partnership, as Respondent, did not arrange for disposal or treatment or arrange for transportation for disposal or treatment of any waste material, including hazardous substances, at or to the site nor does it know of any persons who may have arranged for transportation for disposal or treatment of any waste materials at or to the site. Thus the questions 7 a through 7 q cannot be answered.
8. Since Doehler-Jarvis Limited Partnership was not in existence during the period 1951 through 1981, it did not generate any waste materials, thus did not need to dispose of any waste materials. NL Industries might be able to provide this information.

All information contained herein is true and accurate to the best of the signatory's knowledge and belief.

Sincerely:



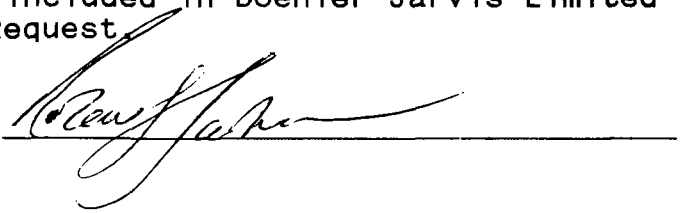
Robert J. Jacobson  
Manager-Environmental Control

STATE OF OHIO     )  
                              )  
COUNTY OF LUCAS )

Robert J. Jacobson, being duly sworn, deposes and says:

I am the Manager-Environmental Control of Doehler-Jarvis Limited Partnership ("Respondent"). Respondent has performed the inquiry required by the United States Environmental Protection Agency's request for information dated August 12, 1993 ("Request") regarding the Stickney Avenue Landfill and the Tyler Street Dump Sites (the "Sites").

Respondent received the Request on August 19, 1993. In connection with the Request, a diligent record search has been completed and there has been a diligent interviewing process with current employees who would likely have knowledge of any shipments of Respondent's materials to the Site. The responsive information resulting from this inquiry is included in Doehler-Jarvis Limited Partnership's response to the Request.



Subscribed and sworn to  
before me this 1st day of  
September, 1993.

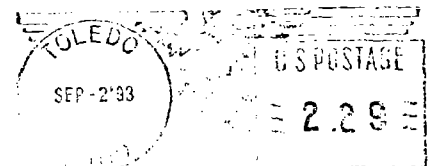
Mary Bafya  
Notary Public

MARY BAFYA  
Notary Public, State of Ohio  
My Commission Expires Feb. 26, 1997



**Doehler-Jarvis**

M.P.O. Box 902, Toledo, Ohio 43691-0902



80996

Ms. Marsha A. Adams  
5HSM-5J  
Responsible Party Search Section  
USEPA  
77 W. Jackson Blvd  
Chicago, IL 60604-3590

60604-3511 10

